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Attorneys for Defendant  
APPLE INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ASHLEY GJOVIK,  
Plaintiff,  
v.

APPLE INC.,  
Defendant.

Case No. 23-cv-4597-EMC

**DECLARATION OF RYAN D. BOOMS  
IN SUPPORT OF DEFENDANT APPLE  
INC.'S MOTION TO STAY IN LIGHT  
OF BANKRUPTCY PROCEEDINGS**

Date: October 23, 2025  
Time: 1:30 p.m.  
Dept: Courtroom 5, 17th Floor  
Judge: Honorable Edward M. Chen

1 I, Ryan D. Booms, declare as follows:

2 1. I am an attorney admitted to practice law in the state of California and am an  
3 associate at the firm Orrick, Herrington & Sutcliffe LLP. I am counsel for defendant Apple Inc. in  
4 this action. I submit this declaration in support of Apple's Motion to Stay in Light of Bankruptcy  
5 Proceedings. I have personal knowledge as to the facts set forth in this declaration. If called as a  
6 witness, I could and would testify competently thereto.

7 2. On August 21, 2025, I attended a public Meeting of the Creditors (the "Meeting")  
8 in the matter *In re Ashley Marie Gjovik*, Case No. 1:25-bk-11496 (Bankr. D. Mass. filed July 21,  
9 2025).

10 3. During the Meeting, the trustee of Plaintiff/Debtor Ashley Gjovik's Chapter 7  
11 Estate, Mark DeGiacomo (the "Trustee"), asked Plaintiff/Debtor, among other things, to identify  
12 any pending litigation she had initiated.

13 4. Plaintiff/Debtor identified, among other matters, her claims against Apple before  
14 this Court (the "Action").

15 5. After questioning Plaintiff/Debtor, the Trustee stated that he would like to schedule  
16 a call with Plaintiff to occur sometime after September 1, 2025, to further discuss the topics  
17 discussed during the Meeting. The Trustee also continued the Meeting to October 30, 2025, at 1:00  
18 p.m.

19 6. During the Meeting, the Trustee did not indicate that he intended to abandon this  
20 Action to Plaintiff/Debtor.

21 I certify under penalty of perjury and pursuant to the laws of the United States that the  
22 foregoing is true and correct.

23 Executed August 25, 2025 in Washington, DC.

24  
25  
26 /s/ Ryan D. Booms  
Ryan D. Booms